DATE:

September 21, 1998

TO:

Dave Dygert

FROM:

Tom Burkart

Re: SAFETY MANAGEMENT SERVICES REPORT

Dave, I recently reviewed the Safety & Health Audit of the Elkhart Division by Mr. Dave Franson. I feel that we have made some nice progress since his original inspection, but I still feel we have a lot of hard work to perform in order to be in full compliance.

I am sending along a copy of the Plant Inspection list and ask that you immediately delegate to personnel responsible to have corrective action taken.

I think it is most important that we look at our compliance in the areas of Management Responsibility, Department Supervision, and Accident Investigation. We should make immediate progress in these particular areas.

I agree with Dave Franson's recommendation on the punch press safety emphasis as put out by Rockford Systems. I strongly recommend that you consider sending one of your personnel to this two-day course and training.

Dave, I know that you will have your personnel aggressively attack this and I would appreciate an update on your progress within the next 60 days.

TB:jp

Attachment

cc: Jim Gilbertson, Ron Klosterman

Plant Inspection

- 1. Receiving Dock Wheels were not chocked on trailers that were being loaded by forklifts. OSHA requires trailer wheels be chocked when entering with a forklift to prevent movement of the trailer. Forklifts
- 2. Warranty and Repair Area There are a number of unlabeled containers in this area. Specifically, spray bottles of Simple Green and glass cleaners, must be labeled. *Hazardous Materials*
- 3. Main Plant Receiving Cage The outlet box in the northwest corner needs to be rewired. It is currently wired with a flex cord. This should be replaced with permanent wiring, i.e. conduit. Also, the fixed light in the area is connected to an extension cord. Extension cords cannot be used for fixed objects. *Electrical Systems (repeat)*
- 4. North Center Plant Exit The Exit sign has a burnt out bulb. This should be replaced. *Emergency Equipment*
- 5. Shipping Dock #3 The dock light has been damaged by a forklift. This light should be tagged as out of service or repaired. *Electrical Systems*
- 6. Arm Sewing The pinch points created by the drive belt and pulley on the various sewing machines in this area are not guarded. *Machine Guarding* (repeat)
- 7. Seat Installation Area Extension cords on the floor create tripping hazards. It is recommended that these cords be placed overhead or out of walking aisles.

 Walking Working Surfaces
- 8. Maintenance Department The bandsaw needs an adjustable blade guard. The front and back sides of the guard for the upper and lower wheel must be enclosed. The holes in the mesh guard allow the operator to access the rotating part. Machine Guarding (repeat)
- 9. Engineering A flex cord is used to wire the outlet for the pedestal fan in this area. This outlet should be hard wired. *Electrical Systems*
- Maintenance Area The small bandsaw needs an adjustable blade guard.
 Machine Guarding
- 11. Walkman Radios/Headsets are currently used on the floor. While OSHA does not have a specific standard regarding their use, they do create safety hazards when used around moving equipment such as forklifts. This reduces an individual's ability to sense the moving piece of equipment. I recommend prohibiting the use of Walkman. NOC
- 12. Leather Cut It is recommended (though not required by OSHA) that the leather cutters use no-cut/Kevlar gloves on their non-knife hands. The OSHA log revealed that there have been two lacerations in this area since my last visit.

 NOC (repeat)

- 13. The 15-minute eyewash station next to the battery charging area must be mounted. In addition, battery charging should be added to the Personal Protective Equipment Assessment Form. *NOC*
- 14. Frame Shop Forklifts in the area must be equipped with load rests. Forklifts
- 15. Jig and Tooling Area A Snapple container in the flammable liquid cabinet is filled with toluene. Hazardous materials should not be stored in food grade containers. All containers should be properly labeled. *Hazardous Materials*
- 16. Jig and Tooling Area One acetylene cylinder had not been properly secured, i.e. chained to the wall. *Hazardous Materials*
- 17. Jig and Tooling Area The drop bandsaw needs an adjustable guard for the unused portion of the blade. *Machine Guarding (repeat)*
- 18. Jig and Tooling Area The pedestal fan in this area is missing a ground prong. Electrical Systems
- 19. Welding Booth #2 A respirator was noted on the wall of this booth. Currently Dygert does not have a written policy for respirators. It is recommended that this respirator be removed or a complete respiratory protection program be developed to include training, fit testing and medical clearance. *NOC*
- It is recommended that side shields be required for all safety glasses in the frame shop due to the potential for a side impact. NOC
- 21. Pines Benders (all three units) The manufacturer of these units should be contacted to determine if point of operation guards are available. According to the warning labels on the machine, a guard was supplied with the unit.

 Machine Guarding (repeat)
- 22. Fish Mouth Press The fly wheel for this press must be enclosed. OSHA requires guarding of all moving equipment below seven feet. *Machine Guarding*
- 23. The Black Federal Press must be equipped with a guard on the back side of the unit to prevent contact with the point of operation. In addition, a guard is required for the inside of the fly wheel. *Machine Guarding*
- 24. Bliss 39P Press The gaps in the barrier guard on the left side of the unit have been bent out and exceed the maximum permissible opening by OSHA. Also the gaps in the guard on the fly wheel should be adequately covered. *Machine Guarding*
- 25. Green Federal Press The outside edge of the fly wheel stills needs to be guarded. In addition, a guard is needed to cover the back side of the unit. *Machine Guarding*

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- 26. The pedestal fan next to the Green Federal Press is missing a ground prong. This should be replaced. *Electrical Systems*
- 27. An extension cord next to the Bliss Press had been repaired in multiple locations with duct tape. This extension cord was removed from service during the audit. *Electrical Systems*

- 28. The presses in this department must be equipped with die blocks. Die blocks are required for lock out tag out purposes when changing out tooling. *Machine Guarding (repeat)*
- 29. A frayed extension cord was observed by the dock door. It appeared this cord had been run over by forklifts. *Electrical Systems*
- 30. The frame of the portable stairs is broken. This reduces the stability of this working surface. Walking Working Surfaces
- 31. The infeed table cover on the bander was not in place. This open area exposes a hot surface and rotating parts which would be guarded if the table cover was in place. *Machine Guarding*
- 32. Clip Gun The connection for the counter balance is unstable (it was secured in place with a wire and spring). *NOC*